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**Attorney for Defendants,  
Simon S. Abraham and  
KDA Holdings LLC**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

EZRA ILANI and CATHY ILANI, individuals

*Plaintiffs*

v.

SIMON S. ABRAHAM, an individual; KDA  
HOLDINGS LLC, a domestic limited liability  
company; KING SOLOMONS TREASURES, LLC, a  
domestic limited liability company; 777 HOLDINGS  
INTERNATIONAL LTD, LLC, a domestic limited  
liability company; AMASIAN GEM CORPORATION  
OF NEVADA, a domestic corporation; LE SIMONE  
JEWELRY LTD., a domestic corporation; KING  
DAVID’S RIVER OF GOLD LLC, a domestic limited  
liability company; JEWELRY JUDGE OF LAS  
VEGAS LLC, a domestic limited liability company;  
LAS VEGAS JEWELRY BROKER, LLC, a domestic  
limited liability company; JOEL LACKEY, an  
individual; Doe Defendants I through X, inclusive; and  
Roe Corporations A through Z, inclusive.

*Defendants.*

CASE NO.: 2:17-cv-00692-APG-PAL

SIMON S. ABRAHAM, individually; and KDA  
HOLDINGS LLC, a Nevada limited liability company,

Defendants and Counterclaimants

v.

EZRA ILANI and CATHY ILANI, individually,

Plaintiffs and Counterdefendants

SIMON S. ABRAHAM, individually; and KDA  
HOLDINGS LLC, a Nevada limited liability company,

Third-Party Plaintiff

v.

ADRIÁN MARCEL CAZARES, individually; and  
CAZARES RESORTS LLC, a Nevada limited liability  
company,

Third-Party Defendant.

### **PROPOSED STIPULATION TO CONTINUE HEARING**

IT IS HEREBY STIPULATED by and between the parties, Plaintiffs, EZRA ILANI and CATHY ILANI (hereinafter collectively referred to as the "Plaintiffs") and Defendants, KDA Holdings, LLC and Simon S. Abraham (hereinafter collectively referred to as the "Defendants"), by and through their respective attorneys of record as follows:

1. The purpose for this Stipulation is to continue the hearing currently set for November 27, 2018, at 10.00 A.M., due to Defendants' counsel having a conflict with another hearing set for the same day and time.

- 1 2. The Plaintiffs' and Defendants' respective counsel conferred on November 14, 2018, via  
2 e-mail, and determined that they would be available to attend a continued hearing at any  
3 time set by the Court from November 28, 2018 through December 7, 2018.
- 4
- 5 3. The Parties also agree that, should any of the above-referenced proposed dates be  
6 inconvenient or unacceptable for any reason, the Court has the discretion to set other  
7 dates which are more convenient or acceptable.

8  
9 Respectfully submitted,

10 Dated this 16<sup>th</sup> day of November 2018.

11 /s/Andras F. Babero, Esquire  
12 Andras F. Babero, Esquire  
13 Nevada Bar No.: 1658  
14 *The Law Office of Andras F. Babero*  
15 9101 West Sahara Avenue  
16 Suite 105-340  
17 Las Vegas, Nevada 89117  
18 ***Attorney for Defendants,***  
19 ***Simon S. Abraham and***  
20 ***KDA Holdings LLC***

21 Dated this 16<sup>th</sup> day of November 2018.

22 /s/Matthew T. Dushoff, Esquire  
23 Kolesar & Latham  
24 Nevada Bar No.: 4975  
25 400 South Rampart Boulevard  
26 Suite 400  
27 Las Vegas, Nevada 89145  
28 ***Attorney for Plaintiffs***  
***Ezra Ilani and Cathy Ilani***

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2 **PROPOSED ORDER**

3 The Court, having reviewed the Stipulation of the Parties and finding good cause, hereby  
4 issues an Order to continue the hearing on Plaintiffs' Motion for Order to Show Cause, and  
5 Defendants' Motion for Protective Order until the 4th day of December, 2018, at the hour of  
6 10:45 A.M.

7 It is so Ordered.

8 Dated this 19th day of November 2018.

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10 Magistrate Judge Peggy A. Leen  
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